

Inner Low Emission Zone(s) for London
(and other campaigning matters...)

**King's College London:
London Air Quality Network Seminar
London 24 April 2009**

**Simon Birkett, Founder and Principal Contact
Campaign for Clean Air in London**
www.cleanairinlondon.org

Summary

Air quality is much worse than most people realise

- **Public health: a reason to get involved**
- **Developing a strategy**
- **Implementing the strategy and focussing on results**
 - **Building local support; Building public awareness; Monitoring progress; Applying the legal framework; and Highlighting issues and solutions**
- **Merits of inner low emission zone(s)**
- **Next steps**

Please share your experiences, views and advice



Heavy traffic in Brompton Road, London

Brompton Road in London looking eastwards with Harrods ahead

How bad is the UK's air quality?

- **24,000 premature deaths from air pollution in Great Britain in 1995/96 (RCEP, March 2007)**
- **Second highest death rate from PM₁₀ in Western Europe (WHO 2007 report based on 2003 data)**
- **Latest EEA Report suggests 2,900 premature deaths in London in 2005 due to PM₁₀ alone. No change?**
- **Compares to national figures of 2,946 deaths from road deaths in 2007 and 617 passive workplace-related deaths**
- **PM₁₀ annual average and many daily legal breaches**
- **London has highest annual average NO₂ of any capital city in western or eastern Europe**
- **UK has a track record of failing to produce credible and timely plans or take action to improve air quality**
- **UK has 'under-forecast' concentrations and health impacts**

Developing a strategy

- **Identifying a need for change: learning about the issues**
- **The value of a simple vision:**
‘The cross-party campaign to achieve urgently and sustainably at least WHO recommended standards of air quality throughout London’
and a broad, transparent, even-handed approach
- **Phase 1: Building local support – cross-party/city**
- **Phase 2: Building public awareness**
- **Phase 3: Monitoring progress from the start**
- **Phase 4: Applying the legal framework**
- **Phase 5: Highlighting issues and promoting solutions**
- **Merits of inner low emission zone(s)**
- **A timescale e.g. clean air sustainably by London 2012**

Implementing the strategy and focussing on results

Phase 1: Building local support – cross-party/city

- **Who are you representing?**
- **Governance and funding: Knightsbridge Association**
- **Over 20 amenity societies in central London**
- **London First, the Central London Partnership and the Knightsbridge Business Group**
- **The value of setting up a formal campaign**
- **Politicians from the four main political parties: a mixture of local, London, national and MEPs**
- **Environmental Protection UK**
- **Mayor Livingstone. Mayor Johnson?**

Implementing the strategy and focussing on results

Phase 2: Building public awareness – media interest

- **A simple campaign message supported by facts**
- **Developing ‘content’:**
 - **Looking for opportunities, ‘horizon scanning’**
 - **Interest in health, something new, legal action and ‘a hook’**
 - **‘Synthesising’ advice from expert contacts**
 - **Always write to the top person or the next level ‘up’**
- **Building reciprocal relationships, responding quickly**
- **Channels: online, newspapers, television and radio**
- **Keeping contacts in touch and crediting them**
- **‘Google alerts’ and Altavista to measure progress**
- **The value of a good website and publishing news**

Implementing the strategy and focussing on results
Phase 2: Building public awareness – campaign website

- **The value of a campaign website**
- **Making it easier for others: ‘access’ and ‘speed’**
- **Making it easier for yourself: ‘filing’ and ‘emailing’**
- **Scaleable: get the best bandwidth you can afford**
- **Publishing ‘content’: letters, updates and research**
- **Sharing ‘favourites’ and highlighting media coverage**
- **Tracking progress: search engine rankings**
- **The value of a *BlackBerry* and building email lists**

Implementing the strategy and focussing on results

Phase 3: Monitoring progress from the start

- **Monitoring results on the London Air Quality Network and the national database**
- **Track Government and local annual announcements**
- **Read medical, legal and other published research**
- **Use ‘Google alerts’**
- **National reports to EU on breaches by 30 September**
- **Lodge Freedom of Information requests and ‘appeal’**
- **Publish findings and seek media coverage**
- **Make the most of elections, consultations etc.**

Implementing the strategy and focussing on results

Phase 4: Applying the legal framework - options

Two years spent lobbying on the new EU Air Quality Directive

Consider:

- **Several EU Air Quality Directives being phased out**
- **New EU Air Quality Directive but remember it only achieves twice WHO's maximum recommended limit for PM_{2.5} by 2020**
- **National statutory legal duties: The AQSR 2007**
- **The important role of the Environment Agency**
- **Statutory duties on Highway Agencies**
- **Replying to EU, UK, London and local consultations**
- **Judicial reviews be worthwhile but may only achieve delay**
- **Seeking early *pro bono* and/or paid legal advice**

Identify breaches and apply legal and media pressure

Implementing the strategy and focussing on results

Phase 4: Applying the legal framework – legal action

- **Particulate matter (PM₁₀)**
 - Press European Commission to issue final written warning to UK, Estonia, Slovenia and Sweden
 - Press European Commission to reject UK's eligibility for a time extension unless it submits a much more convincing plan
- **Nitrogen dioxide (NO₂)**
 - Over 100 UK cities breached the annual 'limit value' in 2008
 - UK urgently needs a plan to ensure full legal compliance
 - Press for early legal action by the Commission on 60 µg/m³
 - Press European Commission to require a time extension notification by early 2010 (based on hourly exceedances)
- **Commissioner Dimas has highlighted the citizen's right to an action plan: European Court of Justice case C-237/07 'Dieter Janacek v Freistaat Bayern'**
- **Widespread legal action is needed in the UK**

Implementing the strategy and focussing on results

Phase 5: Highlighting issues and promoting solutions

Key campaign principles:

- **‘It’s about public health.’ At least comply with the law**
- **Air pollution: climate change and air quality**
- **‘The London Matrix’: Comply with air quality laws in London (or any big city) to show how air pollution and sustainability can be addressed everywhere**
- **‘The London Principle’: Managing air pollution trade-offs by accepting a 1% ‘cost’ for a ‘benefit’ of 10%**
- **‘The London Circles’: Tackle congestion and emissions**
- **Avoid the ‘Busy fool’ problem by prioritising**
- **‘Attacking everywhere, all the time on key issues’**
- **Support effective action by key decision makers**

“The London Matrix”

Ridicule or applause for showing the world how to tackle successfully air pollution and sustainability issues

	Air quality	Climate change
London	London 2012 spotlight	
Rest of world		

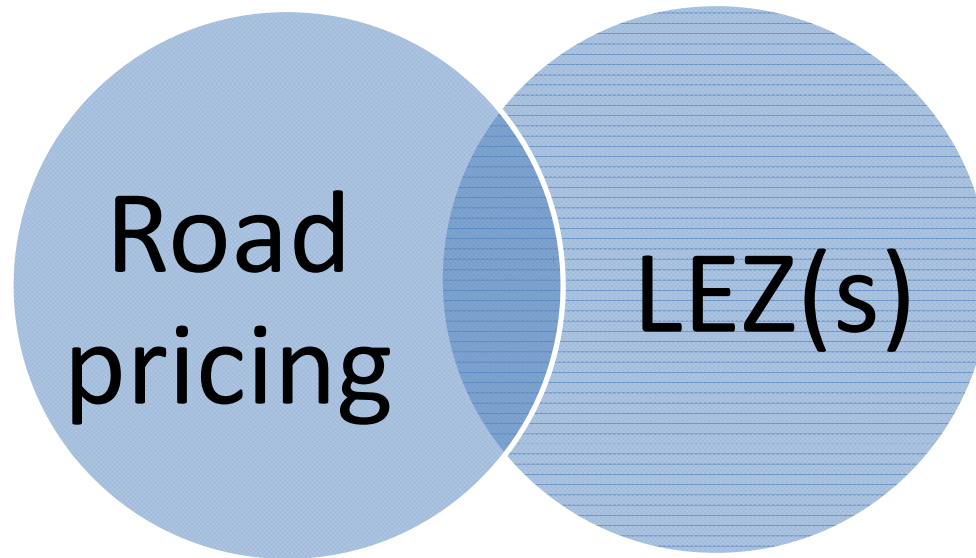
“The London Principle”

A practical approach to air quality/climate change trade-offs

- **Foolish to constrain solutions by ‘no-negative impact on air quality or climate change’**
- **Managing air pollution trade-offs by accepting a 1% ‘cost’ for a ‘benefit’ of 10%**
- **Comply with air quality and climate change obligations including timetables**
- **Diesel emissions in the countryside not cities**
- **Diesel and petrol will not begin to be air quality/climate change neutral until 2015**

“The London Circles”

Transport measures address Congestion and/or Emissions



Implementing the strategy and focussing on results

Phase 5: Highlighting issues and promoting solutions

Key campaign priorities in London:

- **Improving understanding:**
 - **Awareness and education e.g. diesel emissions**
 - **Understanding the need and means for change**
- **Reducing road transport emissions: inner city low emission zones and retrofitting buses and taxis**
- **Reducing emissions from buildings but biomass...**
- **Implementing the Best Practice Guidance on ‘The control of dust from demolition and construction’**
- **Monitoring of fine particulate matter (PM_{2.5}) is key**
- **‘63 recommendations’ submitted to London Assembly**
- **Clean air sustainably for a successful London 2012**

Inner low emission zone(s) in London

What can we learn from Berlin?



Berlin's Environmental Zone Information for Foreign Tourists

Berlin established an Environmental Zone on 1st January 2008. Its purpose is to reduce harmful pollutants in the air that are caused by car emissions.

The Environmental Zone on the Internet: www.berlin.de/umweltzone

The Environmental Zone is an area where only those vehicles are allowed to drive that meet certain exhaust emission standards. This area in Berlin is delimited by the suburban train circle line (S-Bahn). Vehicles with particularly high emissions must stay outside this area. The rule also applies to vehicles registered abroad.

Stickers identifying low-emission vehicles

Coloured windscreen stickers have been introduced in order to be able to check whether a vehicle emits small or large amounts of pollutants. These stickers are valid in all Environmental Zones established in German cities - not just in Berlin, but also for example in Hanover, Cologne or Stuttgart. Foreign tourists also require such a sticker for their vehicles.

There are four pollutant classes, which correspond to the exhaust emission standards (Euro norm) for diesel vehicles. Diesel vehicles can be reclassified in a higher pollutant class if they are retrofitted with a particulate filter. Stickers are not issued for vehicles in pollutant class 1 as these have a particularly high level of air pollutant emissions and may only drive outside the Environmental Zone.

From 1st January 2008 until 31st December 2009 vehicles with a red, yellow or green sticker may drive in the Environmental Zone, but from 1st January 2010 only those with green stickers will be allowed. This tightening of restrictions affects only diesel vehicles.

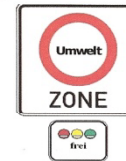
Vehicles registered abroad will be classified either on the basis of documentary evidence that they meet the European emission norms or according to their initial registration date. The following table is intended to give a general overview for passenger cars, but there may be variations in individual cases.

Emission standard (Euro norm)	Pollutant Class	Initial vehicle registration passenger cars	Sticker
Diesel engine			
Euro 1 or older	1	before 01.01.1997	none
Euro 2/ Euro 1 + filter	2	from 01.01.1997 to 31.12.2000	
Euro 3/ Euro 2 + filter	3	from 01.01.2001 to 31.12.2005	
Euro 4/ Euro 3 + filter	4	from 01.01.2006	
Petrol engine			
Before Euro 1	1	before 01.01.1993	none
Euro 1 and better	4	from 01.01.1993	

The Environmental Zone is in the centre of Berlin:



This traffic sign indicates where the Environmental Zone begins:



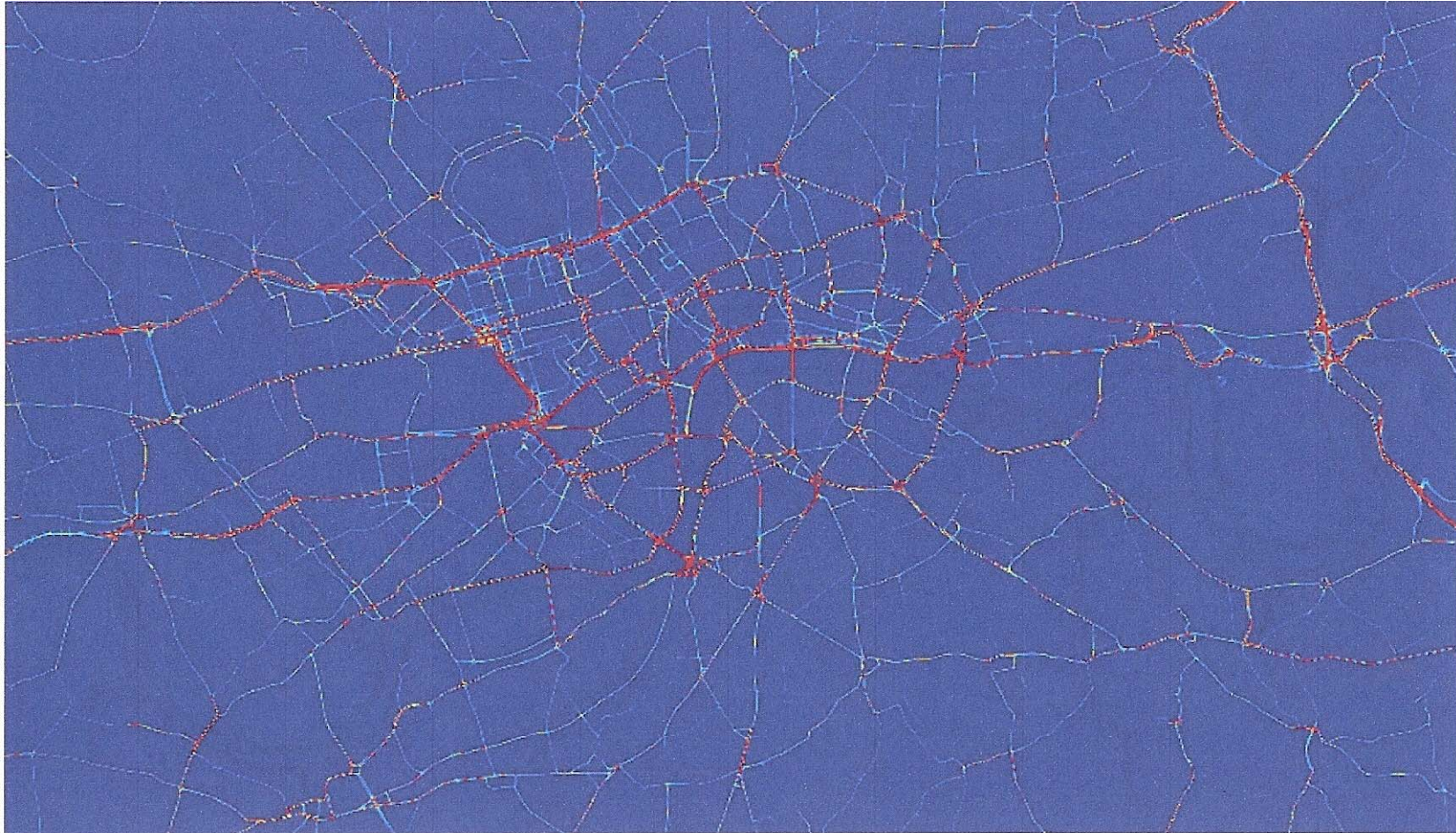
Caution - Fine!
Anyone caught violating the rules of the Environmental Zone must pay a fine of EUR 40.

Attach the sticker to the inside of the windscreen:



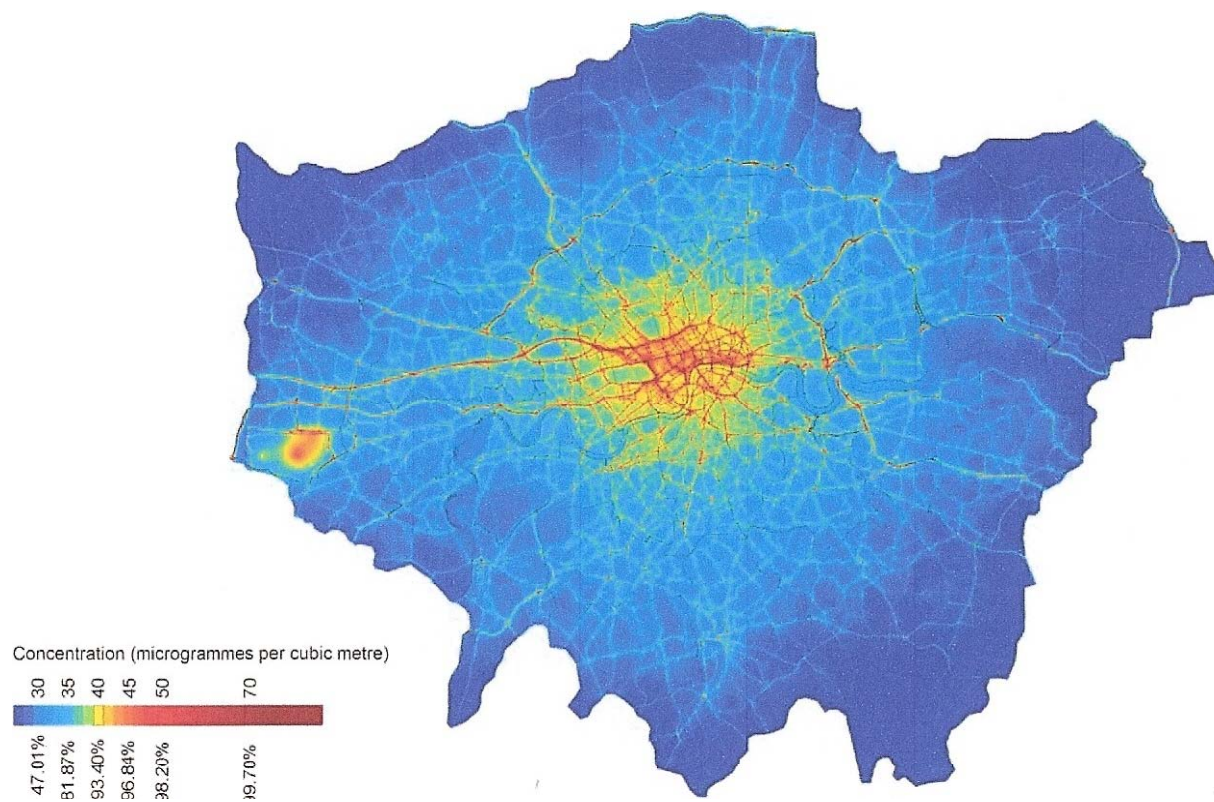
Exceedances of PM₁₀ daily limit value in 2010

London Atmospheric Emissions Inventory 2004



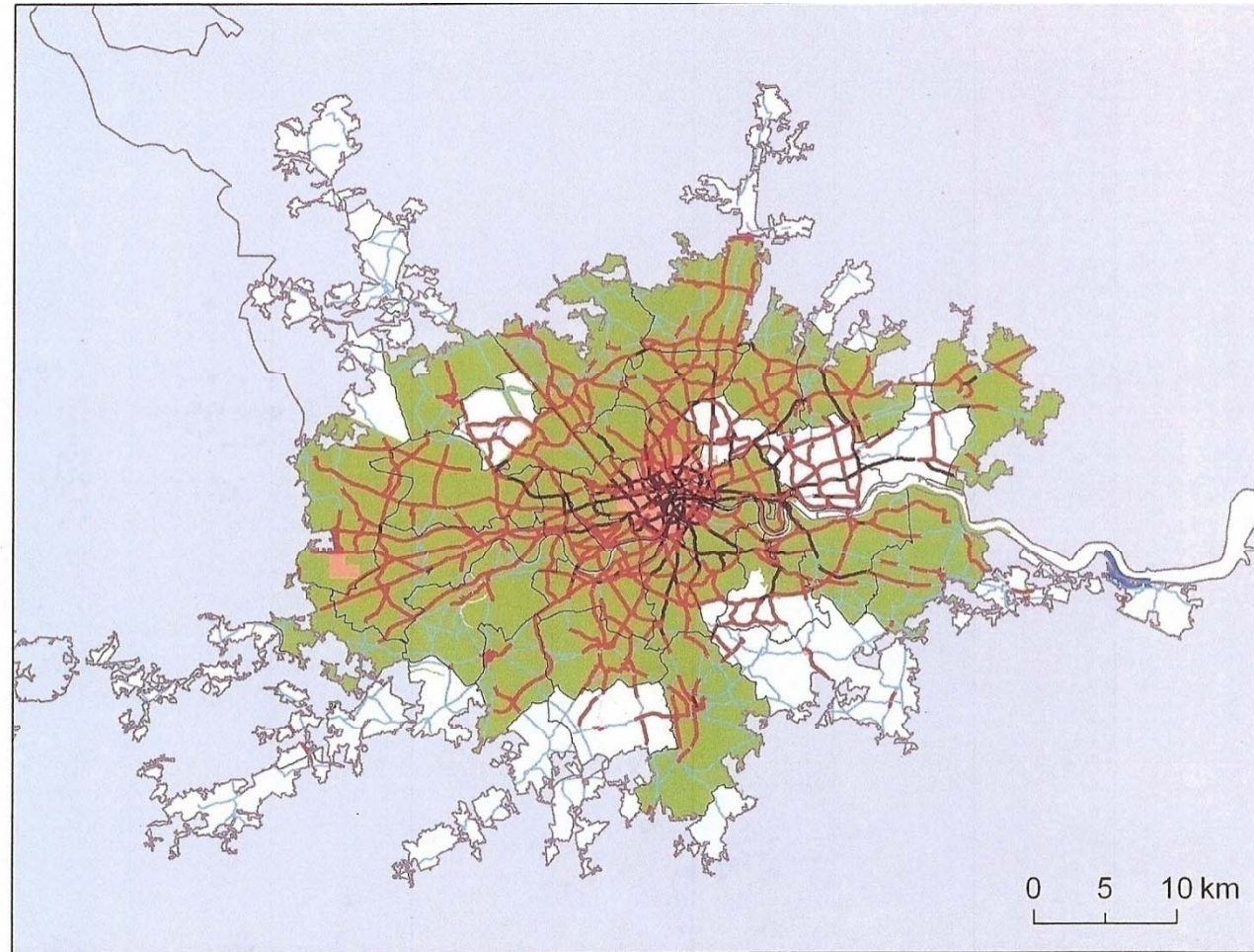
Annual mean NO₂ concentrations in 2010

London Atmospheric Emissions Inventory 2004



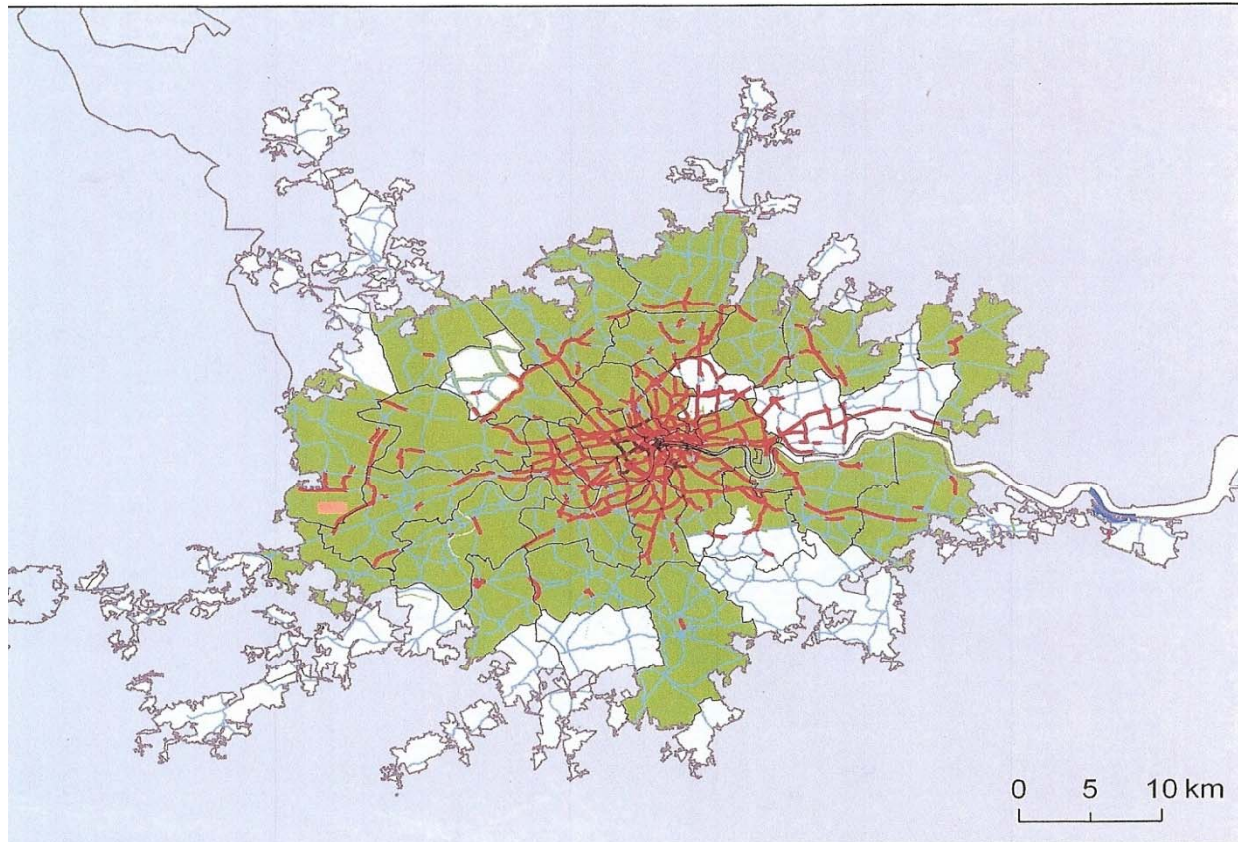
Defra: annual mean NO₂ concentrations in 2010

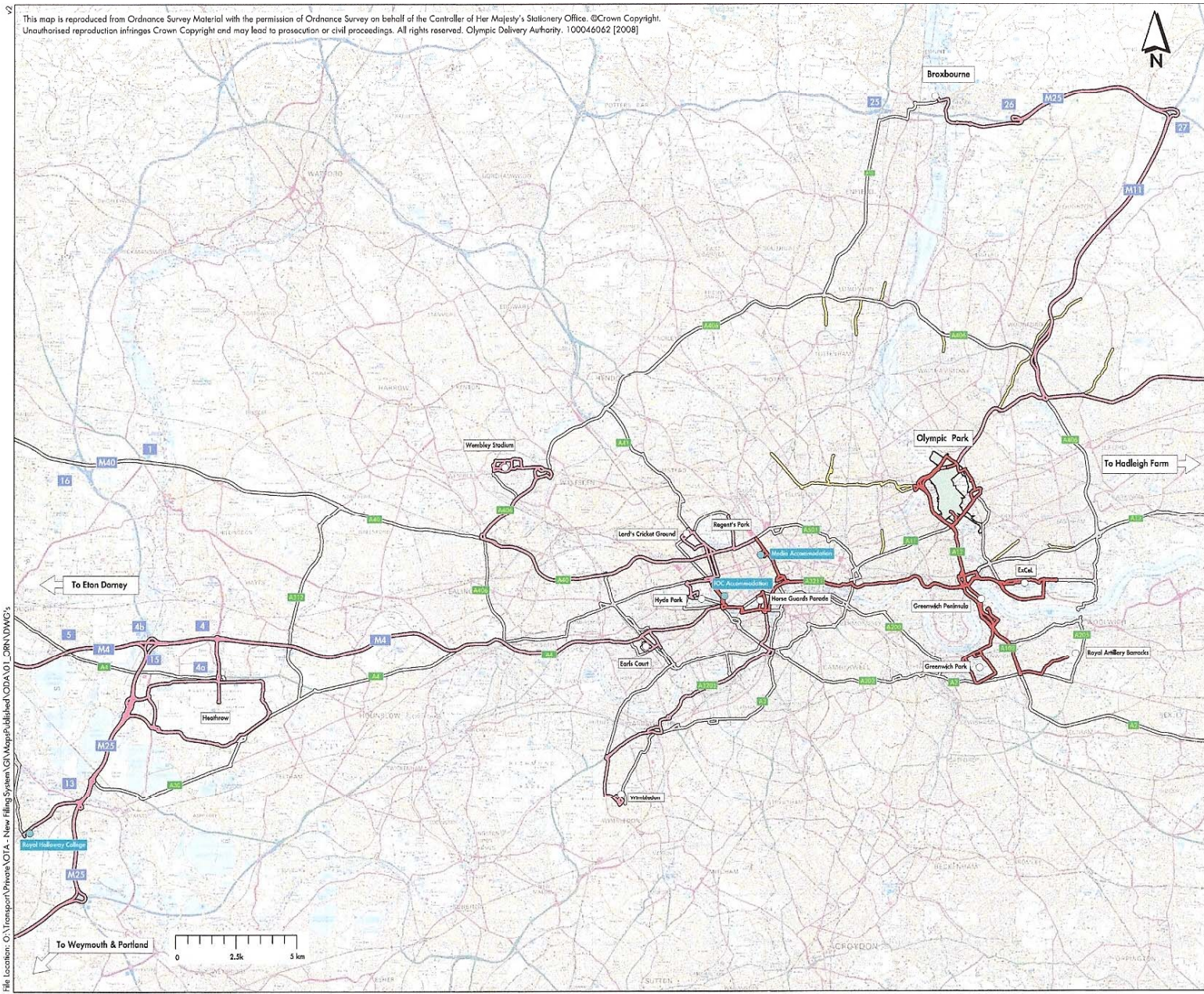
Red exceeds 40 µg/m³ and black exceeds 60 µg/m³



Defra: annual mean NO₂ concentrations in 2015

Red exceeds 40 µg/m³ and black exceeds 60 µg/m³





This map is reproduced from Ordnance Survey Material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. All rights reserved. Olympic Delivery Authority, 100046062 [2008]

Notes

- Olympic Route Network Core
- Olympic Route Network Venues
- Olympic Route Network Alternative
- Olympic Route Network Preferred Training Venues
- Accommodation
- Olympic Venues

Rev	Description	Drawn	Chk'd	Date

The official Emblems of the London Organising Committee of the Olympic Games and Paralympic Games Ltd are © 2007 LOCOG. All rights reserved.

Purpose of Issue: For consultation only

Creator: Olympic Delivery Authority

Project Title: Olympic Route Network

Security Class: PROTECTED

Drawn	Checked	Approved
MB	KA	MT

Scale	Date	Status
N.T.S.	09-12-2008	

Drawing No. **Map 1** Rev.

Olympic Route Network - London

ODA Transport

Olympic Delivery Authority ("ODA") 2008. All rights reserved. Except as permitted by the Copyright, Designs and Patents Act 1998, no part of this document may be reproduced, stored, transmitted or distributed in any form or by any means, whether electronic, mechanical, by photocopy, recording or otherwise, without the prior written permission of a director. Except where otherwise expressly agreed in writing, the ODA shall have no responsibility or liability for any loss (direct, consequential or otherwise) which may arise from reliance on or use of this or the information contained in it.

LONDON, 24 April 2009

Campaign for Clean Air in London

Transport for London manual count sites

London Atmospheric Emissions Inventory 2004

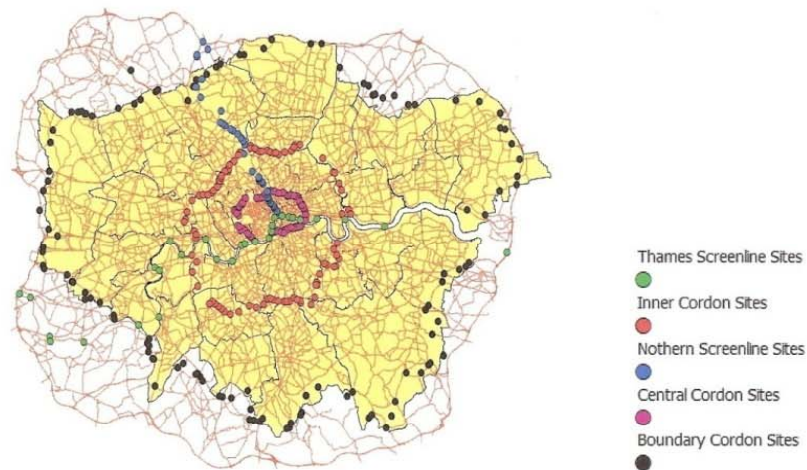
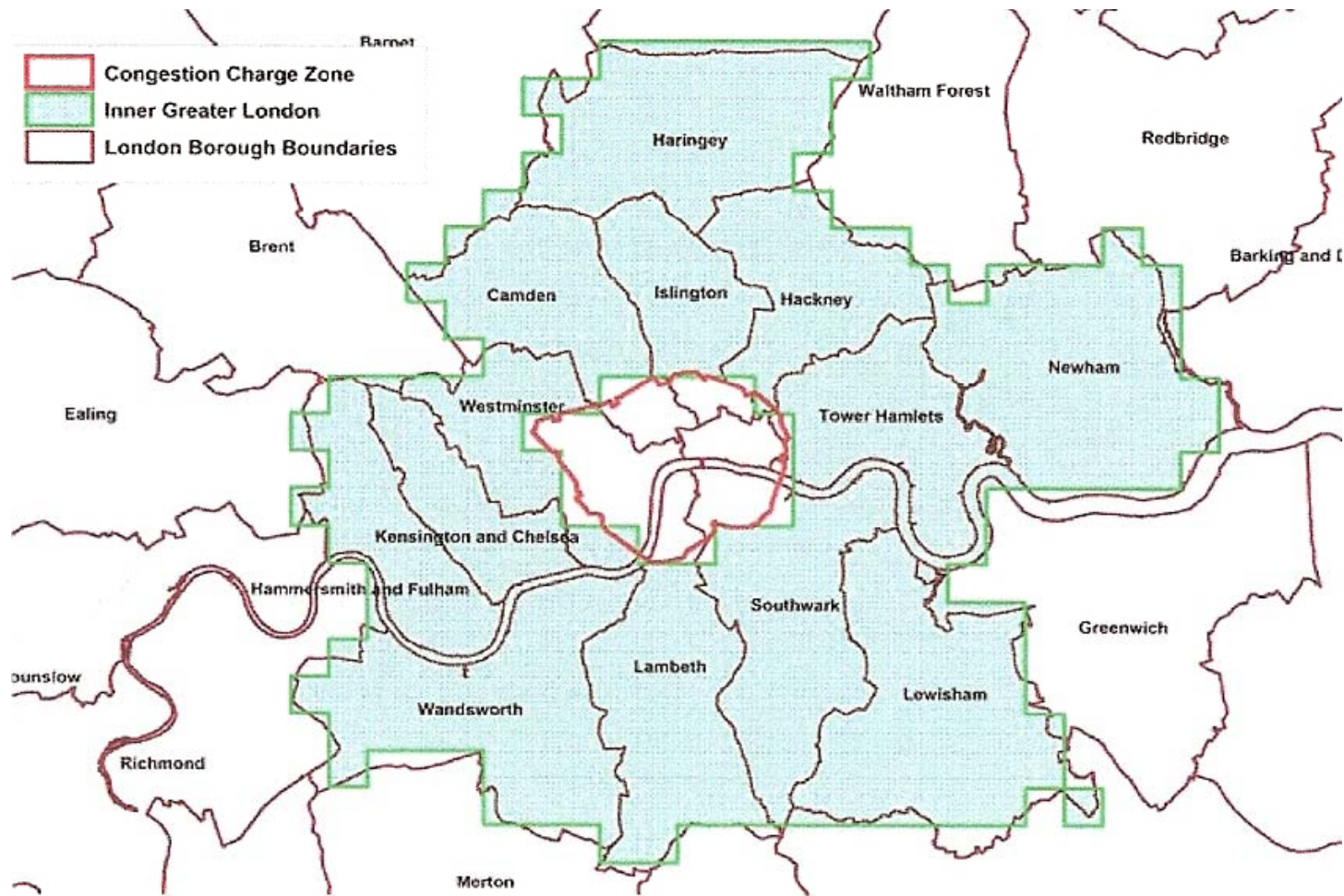


Figure 11 LAEI 2004 Road Network with TFL manual count sites

Borough boundaries in Greater London

London Atmospheric Emissions Inventory 2004



Inner low emission zone(s) in London

What can we learn from Berlin?

- **Some 40 German cities will have LEZs by Jan 2010**
- **A national framework sets the emissions classes and main rules to be used by cities. 5 billion euro 'scrappage scheme'**
- **Three types of sticker: red, yellow and green from Jan 2008**
- **All vehicles (with exceptions): targets diesel emissions; petrol Euro 1 with catalytic converter gets Green sticker**
- **5-15 euro sticker and 40 euro fine plus one penalty point**
- **Based on 'whole' Euro standard not just PM**
- **Retrofitting enables upgrade by one level**
- **Access to LEZs restricted in stages**
- **Warns that LEZ may be tightened more quickly if concentrations do not fall sufficiently**
- **Inputs proportional to outputs: 60% to 95+% compliance through local enforcement (not cameras)**
- **Initial results show 3% fall in PM₁₀ and 10% fall in NO₂**

Inner low emission zone(s) in London

Issues for London

- **Must be 'fit for purpose': sensible inputs and output measured by concentrations not compliance *per se***
- **One or more additional inner LEZs by mid-2010**
- **National NO₂ standards needed for 100 cities. Heathrow? Incremental only impact if M4/M25 is included**
- **'£10 million to convert Central and Western Extension Zone to an LEZ with standards for PM [dangerous airborne particles]'. Source: TfL**
- **'Final' inner boundary at north and south circular roads?**
- **Apply German style Euro and retrofitting standards to address NO₂ as well as PM concentrations**
- **Incentives and exemptions?**
- **It may be possible to slow the tightening of the outer LEZ if the inner LEZ(s) is/are working well? But PM_{2.5}...**

Next steps

- **Increase public understanding of the health issues**
- **Encourage NGO action at a local and national level**
- **Increase media pressure on political leaders**
- **Increase legal pressure on government and London**
- **Monitor progress on meeting air quality obligations**
- **Seek substantial financial backing and build capacity**
- **Short and medium term: align everyone on urgent need for full compliance with legal obligations to protect health**
- **Government and Mayor to seek ‘win-win’ failing which government should issue soon ‘Directions’**

Summary

Air quality is much worse than most people realise

- **Public health: a reason to get involved**
- **Developing a strategy**
- **Implementing the strategy and focussing on results**
 - **Building local support; Building public awareness; Monitoring progress; Applying the legal framework; and Highlighting issues and solutions**
- **Merits of inner low emission zone(s)**
- **Next steps**

Please share your experiences, views and advice

Inner Low Emission Zone(s) for London
(and other campaigning matters...)

**King's College London:
London Air Quality Network Seminar
London 24 April 2009**

**Simon Birkett, Founder and Principal Contact
Campaign for Clean Air in London**
www.cleanairinlondon.org